

November 26, 2002

Re: ParkView Hospital 003-16012-00272

TO: Interested Parties / Applicant

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
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Mr. Howard Cottier
Parkview Hospital
2200 Randallia Drive
Fort Wayne, Indiana 46805

November 25, 2002

Re: 003-16012
Significant Source Modification to:
Part 70 permit No.: T003-11993-00272

Dear Mr. Cottier:

Parkview Hospital was issued Part 70 operating permit T003-11993-00272 on July 11, 2002 for a general medical hospital with a medical waste incinerator and two (2) natural gas-fired boilers. An application to modify the source was received on August 26, 2002. Pursuant to 326 IAC 2-7-10.5 the description for the following emission units are being revised as follows so that they are no longer listed as emergency generators:

- (a) Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.

The operating hour limitations have also been removed for these units.

This significant source modification authorizes modification of the emission units. Operating conditions shall be incorporated into the Part 70 operating permit as a significant permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12. Operation is not approved until the significant permit modification has been issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call Trish Earls at (973) 575-2555, ext. 3219 or dial (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

Technical Support Document
Revised Part 70 permit pages
TE/EVP

cc: File - Allen County
Allen County Health Department
Air Compliance Section Inspector Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Parkview Hospital
2200 Randallia Drive
Fort Wayne, Indiana 46805**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-11993-00272	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 11, 2002 Expiration Date: July 11, 2007

First Significant Source Modification No. 003-16012-00272	Pages Amended: 5, 6, 34, 37 - 39
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 25, 2002

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary hospital source consisting of a medical waste incinerator and two (2) natural gas fired boilers.

Responsible Official:	Howard Cottier
Source Address:	2200 Randallia Drive, Fort Wayne, Indiana 46805
Mailing Address:	2200 Randallia Drive, Fort Wayne, Indiana 46805
General Source Phone Number:	(219) 484-6636
SIC Code:	8062
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) medical waste incinerator, identified as INC, installed in 1984, firing natural gas as supplementary fuel, with a maximum charge rate of 1200 pounds of medical waste per hour, rated at 4.0 million British thermal units (MMBtu) per hour, with a wet scrubber as control, and exhausting to Stack 1.
- (b) Two (2) natural gas fired boilers, firing No. 2 distillate fuel oil as backup, identified as Boiler #1 and Boiler #2, installed in 1971, each rated at 39 MMBtu per hour, and each exhausting to Stack 2.
- (c) Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Emergency generators as follows:
 - (1) Emergency diesel generators not exceeding 1600 horsepower.
 - A) Three (3) emergency generators, each rated at 835 HP;
 - B) One (1) emergency generator rated at 1310 HP;
 - C) One (1) emergency generator rated at 1325 HP;

- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) Two (2) natural gas fired boilers, firing No. 2 distillate fuel oil as backup, identified as Boiler #1 and Boiler #2, installed in 1971, each rated at 39 MMBtu per hour, and each exhausting to Stack 2.
- (c) Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (d) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from the two (2) boilers used for indirect heating purposes which were existing and in operation on or before June 8, 1972, shall in no case exceed 0.8 pounds of particulate matter per million British thermal units heat input.

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations): sulfur dioxide emissions from each of the two (2) boilers using No. 2 fuel oil shall be limited to 0.5 pounds per million BTU heat input when using No. 2 fuel oil. This equates to a fuel oil sulfur content limit of less than or equal to 0.5%.

Compliance Determination Requirements

D.2.3 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the No. 2 distillate fuel oil sulfur dioxide emissions do not exceed 0.5 pounds per MMBtu by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the two (2) boilers, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Emergency diesel generators not exceeding 1600 horsepower.
 - (1) Three (3) emergency generators, each rated at 835 HP;
 - (2) One (1) emergency generator rated at 1310 HP;
 - (3) One (1) emergency generator rated at 1325 HP;
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.3.2 Volatile Organic Compounds (VOC)

- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser without remote solvent reservoirs constructed after July 1, 1990, shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

D.3.3 Operation Limitation

Pursuant to the definition of emergency generators, operation of the five (5) emergency generators shall each be limited to 500 hours of operation annually.

D.3.4 Particulate Matter [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

Record Keeping Requirements

D.3.5 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of the following:
 - (1) The hours of operation of each emergency generator;
 - (2) Records of the annual fuel usage of each emergency generator.

- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Source Modification and Significant Permit Modification to a Part 70 Operating Permit

Source Background and Description

Source Name:	Parkview Hospital
Source Location:	2200 Randallia Drive, Fort Wayne, Indiana 46805
County:	Allen
SIC Code:	8062
Operation Permit No.:	T 003-11993-00272
Operation Permit Issuance Date:	July 11, 2002
Source Modification No.:	003-16012-00272
Permit Modification No.:	003-16126-00272
Permit Reviewer:	Trish Earls/EVP

The Office of Air Quality (OAQ) has reviewed a modification application from Parkview Hospital relating to the operation of a general medical hospital.

History

On August 26, 2002, Parkview Hospital submitted an application to the OAQ requesting to revise the descriptions for two (2) natural gas fired turbine generators that are identified as emergency generators under the insignificant activities section of the Part 70 permit. These units were incorrectly identified as emergency generators in the Part 70 permit application submitted by Parkview Hospital to the OAQ on March 9, 2000. As stated in the source modification application, these units are actually two (2) 450 horsepower (HP) natural gas-fired reciprocating engines used to power two (2) chillers that are part of the hospital's air conditioning system. They are not used as emergency generators because they are essential components to the daily operation of the hospital's HVAC system and operate automatically and regularly during periods of peak cooling demand. By increasing the maximum hours of operation for each of these engines from 500 hours per year to 8,760 hours per year, the increase in potential NOx emissions is greater than 25 tons per year. Parkview Hospital was issued a Part 70 permit on July 11, 2002.

The revised facility description for the two (2) natural gas-fired reciprocating engines is as follows:

- (a) Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.

Existing Approvals

The source was issued a Part 70 Operating Permit (T003-11993-00272) on July 11, 2002. The source has not received any approvals since issuance of the Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
N/A					

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 26, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (2 pages).

Potential To Emit Before Controls (Modification)

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit of Engines at 500 hrs/yr (tons/yr)	Potential To Emit of Engines at 8,760 hrs/yr (tons/year)
PM	0.04	0.10
PM-10	0.04	0.10
SO ₂	0.02	0.01
VOC	0.01	1.14
CO	0.47	3.93
NO _x	1.84	27.95

Note: When engines were considered emergency generators, potential emissions were based on a maximum of 500 hours of operation per year. Since the engines are now being considered as non-emergency units, potential emissions are based on a maximum of 8,760 hours of operation per year.

There are no HAP emissions from the two (2) natural gas-fired reciprocating engines.

Justification for Modification

The increase in the potential to emit of NO_x from this modification to existing units is greater than twenty-five (25) tons per year, therefore, the Title V permit is being modified through a Significant Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4). Since there is a relaxation of the operating hour limit and the associated record keeping requirement for each natural gas-fired reciprocating engine, a Significant Permit Modification will be issued and will incorporate the source modification into the Part 70 permit and give the source approval to operate the emission units as non-emergency units.

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Less than 250
PM-10	Less than 250
SO ₂	Less than 250
VOC	Less than 250
CO	Less than 250
NO _x	Less than 250

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon Part 70 Permit No. T003-11993-00272, issued on July 11, 2002.

Potential to Emit After Controls for the Modification

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units for the modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Two (2) natural gas-fired reciprocating engines	0.10	0.10	0.01	1.14	3.93	27.95	0.0
Other existing units	10.37	9.81	107.15	3.28	43.52	89.01	2.07
Total Emissions	10.47	9.91	107.16	4.42	47.45	116.96	0.0
PSD Major Modification Threshold	250	250	250	250	250	250	n/a

This modification to an existing minor stationary source is not major because the Permittee is maintaining its PSD minor source status. Therefore, pursuant to 326 IAC 2-2 and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this modification.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this modification.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This modification to an existing minor PSD source is not subject to the requirements of 326 IAC 2-2 (PSD) because the source-wide potential emissions of all regulated pollutants, including this modification, is being maintained at less than 250 tons per year and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, therefore, the source remains a minor PSD source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Allen County and has the potential to emit more than one hundred (100) tons per year of SO₂ and NO_x. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

The two (2) reciprocating engines are not subject to the requirements of this rule because they are not sources of indirect heating.

326 IAC 10-4 (Nitrogen Oxides Budget Trading Program)

The two (2) reciprocating engines are not subject to the requirements of 326 IAC 10-4 because they do not meet the definition of an electricity generating unit under 326 IAC 10-4-2(16) or a large affected unit under 326 IAC 10-4-2(27). These units are also not subject to the requirements of 326 IAC 10-1 or 326 IAC 10-3 because they are not located in Clark or Floyd counties and are not in any of the listed source categories under 326 IAC 10-3-1.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no compliance monitoring requirements applicable to this modification at this time.

Changes Proposed

The changes listed below have been made to the Part 70 Operating Permit (T003-11993-00272).

1. To be considered an insignificant activity, the potential uncontrolled emissions from each of the reciprocating engines must meet the exemption levels specified in 326 IAC 2-1.1-3(e)(1) or the exemption levels specified in 326 IAC 2-7-1(21)(A), whichever is lower. Although the potential uncontrolled NOx emissions from each of the reciprocating engines are less than the insignificant activity threshold of 5 pounds per hour, as specified in 326 IAC 2-7-1(21)(A)(v), the potential uncontrolled NOx emissions from each of the reciprocating engines is greater than the exemption level of 10 tons per year as specified in 326 IAC 2-1.1-3(e)(1). Therefore, these units are no longer considered insignificant activities. Section A.3 of the Part 70 permit has been revised to remove the descriptions for the two (2) natural gas-fired reciprocating engines and section A.2 has been revised to include the descriptions for the two (2) engines. Sections A.2 and A.3 are revised as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) medical waste incinerator, identified as INC, installed in 1984, firing natural gas as supplementary fuel, with a maximum charge rate of 1200 pounds of medical waste per hour, rated at 4.0 million British thermal units (MMBtu) per hour, with a wet scrubber as control, and exhausting to Stack 1.
- (b) Two (2) natural gas fired boilers, firing No. 2 distillate fuel oil as backup, identified as Boiler #1 and Boiler #2, installed in 1971, each rated at 39 MMBtu per hour, and each exhausting to Stack 2.
- (c) **Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Emergency generators as follows:
 - (1) Emergency diesel generators not exceeding 1600 horsepower.
 - A) Three (3) emergency generators, each rated at 835 HP;
 - B) One (1) emergency generator rated at 1310 HP;
 - C) One (1) emergency generator rated at 1325 HP;
 - ~~(2) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.~~
 - ~~A) Two (2) emergency natural gas turbine generators, each rated at 450 HP.~~
- (c) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

Although none of the requirements in section D.2 apply to the two (2) reciprocating engines, these units have been added to the facility description box for section D.2 so that all the emission units are listed in section D as follows:

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (b) Two (2) natural gas fired boilers, firing No. 2 distillate fuel oil as backup, identified as Boiler #1 and Boiler #2, installed in 1971, each rated at 39 MMBtu per hour, and each exhausting to Stack 2.
- (c) **Two (2) natural gas-fired reciprocating engines, each with a maximum rating of 450 horsepower (HP), used to provide power to two (2) chillers which are part of the air conditioning system.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

2. Since the two (2) reciprocating engines are not emergency generators, they are not subject to the annual operating hour limit which emergency generators must comply with. Condition D.3.3 has been revised so that the number of emergency generators is changed from seven to five as follows:

D.3.3 Operation Limitation

Pursuant to the definition of emergency generators, operation of the ~~seven (7)~~ **five (5)** emergency generators shall each be limited to 500 hours of operation annually.

Since there are no applicable requirements for the two (2) reciprocating engines, their descriptions have been removed from the facility description box in section D.3 also.

Facility Description [326 IAC 2-7-5(15)]:

- (a) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (b) Emergency diesel generators not exceeding 1600 horsepower.
 - (1) Three (3) emergency generators, each rated at 835 HP;
 - (2) One (1) emergency generator rated at 1310 HP;
 - (3) One (1) emergency generator rated at 1325 HP;
- ~~(c) Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.~~
 - ~~(1) Two (2) emergency natural gas turbine generators, each rated at 450 HP.~~
- ~~(d)~~**(c)** Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Conclusion

The operation of this general medical hospital shall be subject to the conditions of the attached proposed Significant Source Modification No. 003-16012-00272.

**Appendix A: Emissions Calculations
Natural Gas Combustion**

Page 1 of 1 TSD App A

Company Name: Parkview Hospital
Address City IN Zip: 2200 Randallia Drive, Fort Wayne, Indiana 46805
Source Modification No.: 003-16012-00272
Plt ID: 003-00272
Reviewer: Trish Earls/EVP
Date: September 17, 2002

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

2.3

19.7

Pollutant						
Emission Factor in lb/MMCF	PM* 10.0	PM10* 10.0	SO2 0.6	NOx 2840.0	VOC 116.0	CO 399.0
Potential Emission in tons/yr	0.10	0.10	0.01	27.95	1.14	3.93

Methodology

Maximum capacity (HP) * 2,546 Btu/HP-hr * 1.0 e -06 = Maximum Heat Input Capacity (MMBtu/hr)

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission Factors are from US EPA's FIRE version 6.23, SCC 2-03-002-01.

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.